

Simon Hoare MP
Chair of the Public Administration and Constitutional Affairs Committee
House of Commons
London SW1A 0AA

October 2025

Dear Chair,

Following the Committee's evidence session with the former Registrar of Consultant Lobbyists, Mr Harry Rich, the Chartered Institute of Public Relations (CIPR) thought it might be useful to write to you with our position and evidence on a number of the matters discussed.

As you will see, we support many of Mr Rich's views although we do have some positions of significant difference. The questions below are sequenced in the same order in which they were asked at the session. We haven't sought to answer all the Committee's questions, just the ones where we have a position.

I hope this proves useful to the Committee's work.

Kind regards,



Alastair McCapra
CIPR CEO

How transparent is lobbying in the UK?

Mr Rich's view that lobbying transparency in the UK is "reasonable but not perfect" is a fair if slightly optimistic one.

It is estimated that the register of consultant lobbyists [captures up to 4%](#) of all lobbying activity in Westminster. Indeed, the CIPR report – [No Rules Britannia?](#) - found Westminster's Lobbying Register is the least transparent in the West accounting for just 0.5% of lobbyists registered across all jurisdictions analysed (Westminster, USA, EU, IRE, AUS, CAN, FRA, GER, and Holyrood) and has the least number of registrations when compared with those registers.

We agree with Mr Rich's view that the register should include more detailed information from consultant lobbyists including records of when communication happened, who was communicated with, and on what subject. As pointed out, this can be addressed by secondary legislation.

Would a better approach be to include all lobbyists rather than just consultant lobbyists?

The CIPR strongly supports this view and is actively campaigning for the Westminster register to include all lobbying activity as opposed to what we have now which is a register of a small number of lobbyists. We disagree with Mr Rich's view that "it is best only to deal with consultant lobbyists on the proviso that the disclosure info by ministers is of high enough quality".

Even if the department disclosures were published in a timely manner and with more detailed information, it would still require those looking for a complete picture of lobbying activity in this country to work with two different and uncomplimentary data sets. This does not provide accessibility or accuracy and actually contributes to the erosion of public trust as the public sees only a fraction of lobbying that does take place, usually by larger organisations.

When compared with international counterparts, we are one of two registers that does not include in-house lobbyists (the other is Australia) and one of three registers that does not include think tanks and NGOs (the others are Australia and the USA).

The technology is available for a comprehensive and accessible register that provides an accurate picture of who is seeking to influence policy making in Westminster.

Should the lobbying of MPs be included on the register?

The CIPR agrees with Mr Rich that, under the current system, registering all lobbying of MPs would be overly burdensome and not particularly useful. A comprehensive online register that allows users to search by Parliamentarian would allow for that. In the meantime, there is a strong argument that lobbying Party Leaders or opposition ministers be included. This is particularly worth considering in the context of when a general election is called.

We agree with Mr Rich that special advisors (SPADs) and senior civil servants from director general level and above should be captured and, again, this can be achieved through secondary legislation.

Should charity and third sector organisations register their lobbying?

The CIPR believes that all lobbying activity should be captured, whoever it is by. This should include charities and NGOs as well as think tanks and trade unions. Lobbying is a force for good and the wider range of voices that are heard in policy debates lead to better policy formation. The impact of lobbying can be significant, irrespective of the type of organisation that is doing the lobbying and therefore it should be accountable to the public.

The CIPR membership is made up of lobbyists from all organisation types and our polling demonstrates the appetite for transparency across the whole profession with almost 83% agreeing or strongly agreeing that the statutory register should include all lobbyists.

The benefit of this is to parliamentarians who can build public trust by demonstrating they are meeting with many voices on a variety of issues.

How does Westminster's lobbying register compare with international counterparts?

The CIPR produced a report – [No Rules Britannia?](#) – exploring this very question. It found that Westminster's register has the fewest lobbyists recorded even when adjusted for population. It is also the least transparent about what constitutes lobbying, only capturing consultant lobbyists who make up a small percentage of the industry. It also revealed:

- The US has ten times more lobbyists on its public register than those registered in Westminster, even when adjusted for population
- The EU has more than 8 times as many registered lobbyists per million people than Westminster
- Scotland/Holyrood has 69 times more registered lobbyists per million people than Westminster

Should ministers seek out a diverse range of voices when making policy?

We strongly agree with Mr Rich's view that "lobbying done right is very important in policy making" and that a wide range of voices should be sought out when developing or amending legislation.

The CIPR is calling for the lobbying register to be widened so that it captures all lobbying activity, whoever it may be done by. This will benefit parliamentarians who can then demonstrate to the public that they are seeking a diverse range of voices on particular policy matters.

How useful was the post legislative scrutiny exercise?

The CIPR gave oral evidence as part of the Committee's post legislative scrutiny exercise and share Mr Rich's disappointment with the lack of impact.

The CIPR's [Failure by Design](#) report highlights the specific concerns we have with the legislation, including many of those raised by Mr Rich:

1. We agree that there is a lack of information shared on the register.
2. We agree that special advisors should be included in the list of those that, when lobbied, should appear on the register.
3. We support the scrapping of the VAT exemption.
4. We agree that a graded fee scheme would be a fairer way to ask organisations to appear on the register.
5. We agree that the incidental exemption should be scrapped and that all lobbying activity, however significant to an organisation, should be captured.

How confident are you that all lobbying that should be registered is being registered?

As per Mr Rich's evidence, we don't know the numbers of those that are not registering when they should be. Due to the exemptions within the Act, as highlighted in the CIPR's [Failure By Design report](#), there are simple ways organisations can avoid registering if they wish to.

Further information, please contact:

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